

EXHIBIT 2

Allison Miller ~ May 15, 2019

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1 DISTRICT COURT
2 CLARK COUNTY, NEVADA
3 * * * *
4 WOODS & ERICKSON, LLP, a)
Nevada limited liability)
5 partnership, d/b/a WOODS)
ERICKSON & WHITAKER, LLP,) CASE NO. A-18-774926-C
6) DEPT NO. XX
Plaintiff,)
7)
vs.)
8)
ANDREW B. PLATT, an individual;)
9 L&S COUNSELORS, LTD., a Nevada)
limited liability company;)
10 GATEHOUSE STRATEGIES, LLC, a)
Nevada limited liability)
11 company; JOHN DOE DEFENDANTS I)
through X; and ROE ENTITIES I)
12 through X,)
13 Defendants.)
_____)

**CERTIFIED
COPY**

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17 DEPOSITION OF ALLISON MILLER
18 Taken on Wednesday, May 15, 2019
19 At 11:00 a.m.
20 At 2450 St. Rose Parkway, Suite 200
21 Henderson, Nevada
22
23
24
25 REPORTED BY: CHRISTY L. DeJONKER, CCR NO. 691

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1 A. Yes.

2 Q. Did you have any knowledge that Andrew was
3 providing legal services outside of Woods & Erickson
4 prior to the time that he left?

5 A. The only thing that I knew was that he was
6 helping his kids' school. That is the only thing that
7 I knew.

8 Q. And was that Renaissance?

9 A. I think so.

10 Q. Okay. What was he doing with relation to
11 that, to your knowledge?

12 A. To my knowledge, he brought in a file cabinet
13 full of documents and said they were a mess and he was
14 going to clean it up. I'm paraphrasing.

15 Q. Okay. Do you know anything else about the
16 Renaissance work that he did?

17 A. I don't.

18 Q. Do you know if he received any compensation
19 for that work?

20 A. I did not at the time.

21 Q. Do you know today?

22 A. I believe he maybe did.

23 Q. Okay. When did you first learn that?

24 A. Just, actually, maybe within the last month
25 or so when Kathy found some references or something.